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December 18, 2006

### VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, N.W.  
Washington, D.C. 20054

*Re: Impsat Fiber Networks, Inc., Transferor, and Global Crossing Limited,  
Transferee, Application for Consent Pursuant to Section 214 of the  
Communications Act of 1934, as Amended, to Transfer Control of Impsat Fiber  
Networks, Inc.'s Authorized U.S. International and Domestic Carrier Subsidiary,  
Impsat USA, Inc., to Global Crossing Limited, WC Docket No. 06-215*

Dear Ms. Dortch:

The purpose of this letter is to report a change in the ownership structure for the transaction proposed in the above-referenced application. As described in that application, Global Crossing Limited ("GCL") and Impsat Fiber Networks, Inc. ("Impsat") seek Commission consent to the transfer of control of Impsat's wholly owned Commission-licensed U.S. subsidiary, Impsat USA, Inc. ("Impsat USA"), to GCL.

Two of the entities identified in the application as having a ten-percent or greater post-transaction interest in Impsat—South American Crossing Holdings Limited and GC International Networks Ltd.—have been removed from the chain of ownership. As a result, U.K. Holdco 1 will become a direct, wholly owned subsidiary of Global Crossing Holdings Limited. The remainder of the proposed ownership structure will continue to be as described in the application. Revised organizational charts reflecting this change are attached.

The removal of these two intermediate holding companies from the ownership chain will not affect the ultimate control of Impsat USA. Accordingly, it should not impact the analysis set forth in the application. In fact, if anything, this change simplifies the proposed ownership of Impsat USA, and thus should facilitate the Commission's review.

The Applicants request that the Commission consider this change in its review of the following applications filed in connection with the proposed transaction:

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- WC Docket No. 06-215 – domestic section 214 authorization<sup>1</sup>
- File No. ITC-T/C-20061128-00533 – international section 214 authorizations<sup>2</sup>
- File No. SES-T/C-20061128-02052 – earth station licenses<sup>3</sup>
- File No. SCL-T/C-20061128-00011 – submarine cable landing license<sup>4</sup>

In accordance with 47 C.F.R. § 1.65, this letter and attachment (and a receipt of its filing through ECFS) will be transmitted separately to the relevant personnel processing these applications.

Please contact the undersigned should you have any questions. Thank you for your attention to this matter.

Truly yours,



Brian Murray  
Counsel to Global Crossing Limited

Attachment

cc (via electronic mail):

Wayne Johnsen (counsel to Impsat USA)  
Susan O'Connell  
David Krech  
Cecilia Seppings  
Jodie May  
Joann Lucanik  
Jeanette Spriggs

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<sup>1</sup> See *Domestic Section 214 Application Filed for the Transfer of Control of Impsat USA, Inc. from Impsat Fiber Networks, Inc. to Global Crossing Limited*, Public Notice, DA 06-2470, WC Docket No. 06-215 (rel. Dec. 5, 2006).

<sup>2</sup> See *Streamlined International Applications Accepted for Filing*, Public Notice, Report No. TEL-01097S, File No. ITC-T/C-20061128-00533, at 2 (rel. Dec. 15, 2006).

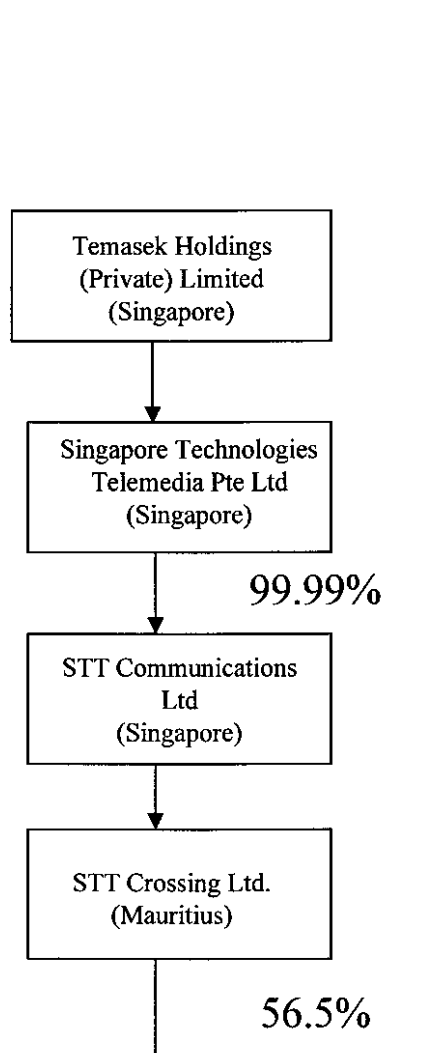
<sup>3</sup> See *Satellite Communications Services Re: Satellite Radio Applications Accepted for Filing*, Public Notice, Report No. SES-00878, File No. File No. SES-T/C-20061128-02052, at 10 (rel. Dec. 6, 2006).

<sup>4</sup> See *Streamlined Submarine Cable Landing License Applications Accepted for Filing*, Public Notice, Report No. SCL-00021S, File No. SCL-T/C-20061128-00011, at 2 (rel. Dec. 15, 2006).

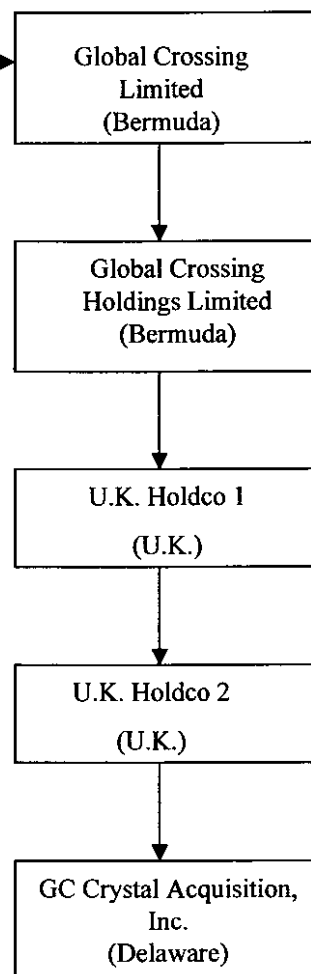
# Pre-Merger Corporate Structure



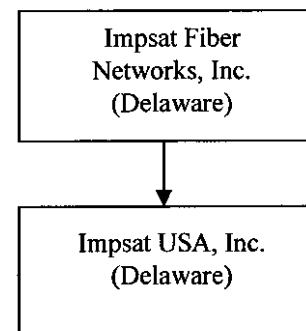
## ST Telemedia



## Global Crossing



## Impsat



**Note: All ownership interests are 100% unless otherwise indicated**

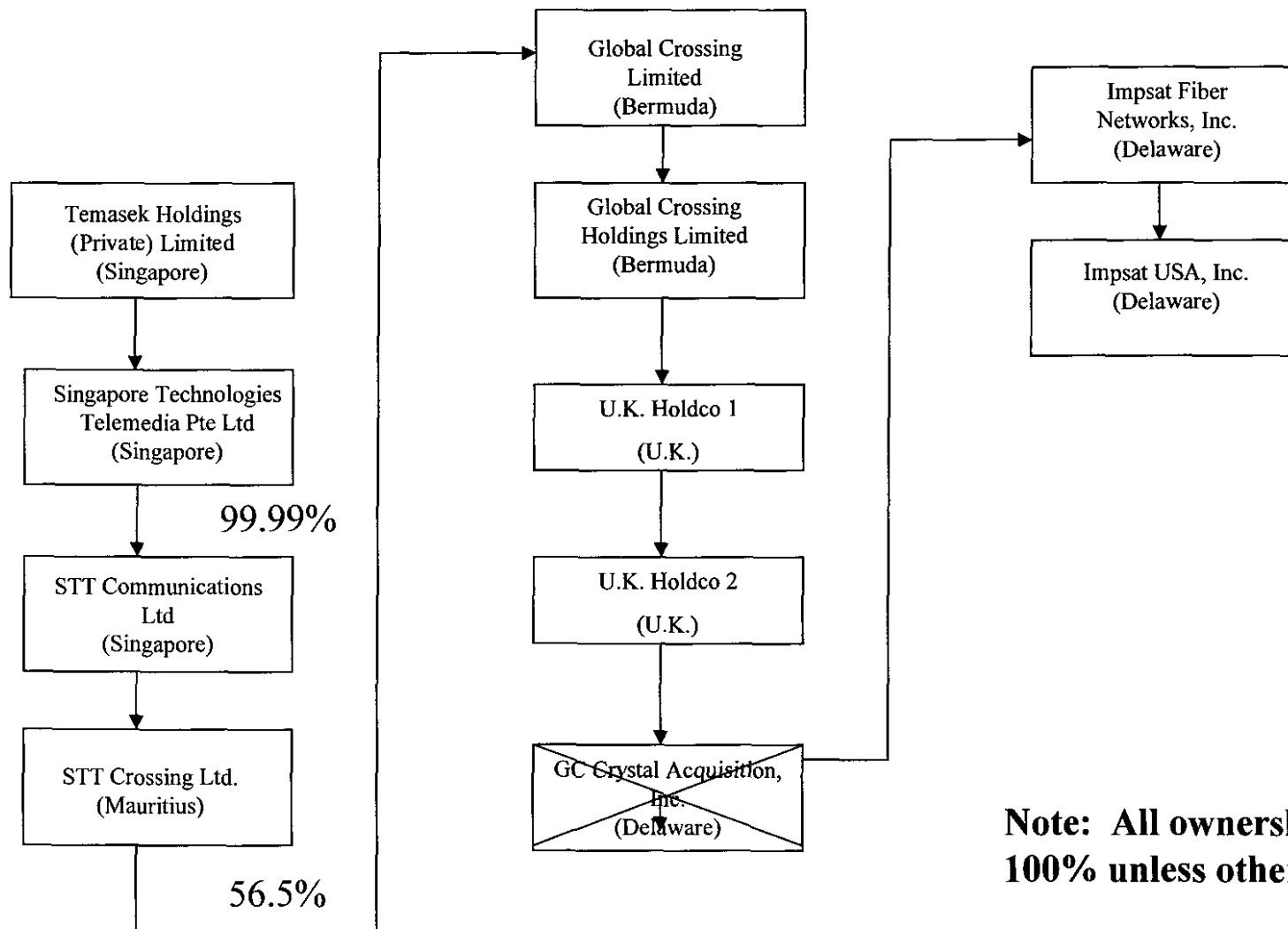
# Post-Merger Corporate Structure



## ST Telemedia

## Global Crossing

## Impsat



**Note: All ownership interests are 100% unless otherwise indicated**